Sundstrand Corporation





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April 4, 1985

Mr. George Madany
United States Environmental
Protection Agency
230 S. Dearborn
Chicago, Illinois 60604

Dear Mr. Madany:

Following Sundstrand's report on March 20, 1985 to the National Response Center regarding the probable continuous leaking of hazardous materials into the environment you contacted me and requested that I provide to you a report relating to the release. Unless advised by you to the contrary, I will assume that the information contained in this letter meets all of your requirements.

As I advised you in our telephone conversation, Sundstrand reported on December 7, 1984 to the National Response Center the release of toluene into the environment from our facility located at 4747 Harrison Avenue, Rockford, Illinois 61125. In connection with our efforts to determine the location of the released toluene and the movement of ground water at this location we employed a consultant which, among other things, installed twelve monitoring wells. As the result of samples taken from certain of the wells we learned that other contaminants were present in the ground water.

Based upon the information provided by the consultant, we then commenced efforts to determine whether the source of the other contaminants was from our plant site or from a source located elsewhere. Through the installation of additional monitoring wells we were able to determine that the source of the contaminants was probably from our facility. Thereafter we commenced efforts to determine the specific sources of the release into the environment. As a result of this effort, we were able to pin point three potential sources from which it was probable releases had continuously occurred over a significant period of time. These sources can be described as follows:

- 1. Three tanks located within the plant used for the accumulation and temporary storage of hazardous wastes;
- 2. A tank farm and hazardous waste containment sump located on the east side of the plant; and

3. Concrete trenches located in a test area within the plant.

After determination of these potential sources we advised the National Response Center on March 20, 1985 and efforts were immediately made as appropriate to either restrict or totally eliminate their usage. In addition, instructions were given to evaluate possible alternatives relating to correction of the potential sources and to address the contaminants in the soil. Further, our consultant was authorized to help determine whether a plume exists, the location of the plume if it exists, and the development of a remedial action plan.

Presently, we are moving forward with remedial action regarding the toluene release and anticipate the installation of necessary equipment and start up by June of this year. This remedial plan is being developed with our consultants and we are coordinating our efforts with the Ilinois Environmental Protection Agency to insure their acceptance of the plan and the issuance of such discharge permits as will be necessary.

Regarding the release of the toluene, tetrachloro-ethylene, trichlorotheylene, 1,1 dichloroethylene and 1,1,1 trichloroethane which was reported to the National Response Center on March 20, 1985, you should be advised that we are still engaged in investigatory work. Internally, we are developing a remedial action plan relating to the correction of the potential sources which we have isolated including action to address contaminated soil. We have further authorized our consultant to install the additional monitoring wells which it has advised will be necessary to determine the location of the plume of contaminated ground water, asssuming a plume exists.

Although we have not as yet established a firm timetable for this action, I can indicate that the development of our internal remedial action plan is proceeding and the first report is presently under review. With respect to the installation of monitoring wells, the consultant has already commenced the drilling of same. It is our intent to diligently move forward with our efforts and we will be coordinating with the Illinois Environmental Protection Agency to insure that the remedial action plan which we develop is acceptable to it.

Very truly yours,

SUNDSTRAND CORPORATION

William R. Coole

Assistant General Counsel

WRC: jmf